

Judge: Hon. Thomas W. Dore
Chapter 13
Location: Seattle
Hearing Date: June 1, 2022
Hearing Time: 9:30a.m.
Response Date: May 25, 2022

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In Re:

BEVERLY JANE CARY

Debtor

Bankruptcy Case No. 20-12450 TWD

Adversary Case No. 22-01000-TWD

BEVERLY JANE CARY,

Plaintiff,

v.

PATCH SERVICES, LLC d/b/a NOAH;
PATCH HOMES, INC.; FIRST AMERICAN
TITLE INSURANCE COMPANY LENDERS
ADVANTAGE,

Defendants.

NOTICE OF MOTION AND HEARING
ON DEFENDANT'S MOTION TO
STRIKE PLAINTIFF'S SECOND
AMENDED COMPLAINT

PLEASE TAKE NOTICE that Defendant First American Title Insurance Company
Lenders Advantage ("FATIC")'s Motion to Strike Plaintiff's Second Amended Complaint
IS SET FOR HEARING AS FOLLOWS:

JUDGE: Thomas W. Dore

TIME: 9:30a.m.

PLACE: Seattle

DATE: Wednesday, June 1, 2022

100047/002553/02634490-1

NOTICE OF MOTION AND HEARING -1

Case No. 22-01000-TWD

LAGERLOF LLP

701 PIKE STREET, SUITE 1560

SEATTLE, WA 98101

1 IF YOU OPPOSE the Motion, you must file your written response with the Clerk's
2 office of the bankruptcy court and deliver copies to the undersigned and all parties NOT
3 LATER THAN THE RESPONSE DATE, which is June 1, 2022. If you file a response,
4 you are also required to appear at the hearing.

5 IF NO RESPONSE IS TIMELY FILED AND SERVED, THE COURT MAY, IN
6 ITS DISCRETION, GRANT THE MOTION PRIOR TO THE HEARING WITHOUT
7 FURTHER NOTICE, AND STRIKE THE HEARING.

8 DATED this 2nd day of May 2022.

9 **LAGERLOF LLP**

10 s/ Robert A. Bailey

11 Robert A. Bailey, WSBA No. 28472

12 701 Pike Street, Ste 1560

13 Seattle, WA 98101

14 Phone: 206-492-2300

15 Email: rbailey@lagerlof.com

16 Attorneys for First American Title
17 Insurance Company

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DECLARATION OF SERVICE

I hereby declare under penalty of perjury of the laws of the State of Washington and the United States of America that on this 2nd day of May 2022, I electronically filed the foregoing with the Clerk of the Court for the United States District Court, Western District of Washington using the CM/ECF system, which will provide notice to the following parties:

Melissa A. Huelsman, WSBA No. 30935 Law Offices of Melissa A. Huelsman, P.S. 705 2 nd Ave, Suite 606 Seattle, WA 98104 <i>Attorney for Plaintiff</i>	<input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input type="checkbox"/> By Email: mhuelsman@predatorylendinglaw.com <input checked="" type="checkbox"/> By CM/ECF E-Service
Mark McClure, WSBA No. 24393 Law Offices of Mark McClure, PS 1103 W. Meeker St., Suite 101 Kent, WA 98032 <i>Attorney for Plaintiff</i>	<input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input type="checkbox"/> By Email: mark@mcclurelawgroup.com <input checked="" type="checkbox"/> By CM/ECF E-Service
Christina L. Henry, WSBA No. 31273 Henry & Degraaff, PS 119 1 st Ave S., Suite 500 Seattle, WA 98104 <i>Attorney for Plaintiff</i>	<input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input type="checkbox"/> By Email: chenry@hdm-legal.com <input checked="" type="checkbox"/> By CM/ECF E-Service
Faye Rasch, WSBA No. 50491 Law Office of Faye C. Rasch 600 Stewart St., Suite 1300 Seattle, WA 98101 <i>Attorney for Defendant Patch Services LLC</i>	<input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input type="checkbox"/> By Email: fraschlaw@gmail.com <input checked="" type="checkbox"/> By CM/ECF E-Service

DATED this 2nd day of May 2022 at Seattle, Washington.

s/ Karrie L. Blevins
Karrie L. Blevins, Paralegal
Lagerlof LLP

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NOTICE OF MOTION AND HEARING -3

Case No. 22-01000-TWD

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